

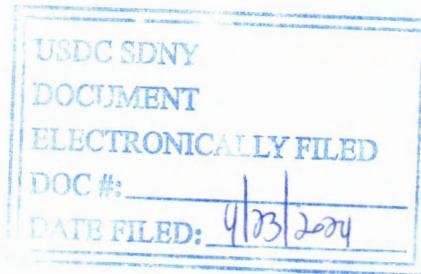
advocates for justice chartered attorneys

225 Broadway, Suite 1902
New York, New York 10007

t. (212) 285-1400

f. (212) 285-1410

www.afjlaw.com



Laine A. Armstrong

Principal Attorney

laine@advocatesny.com

April 23, 2024

ORSED

Postpone conference until June 27, 2024 @ 11:15 AM

By ECF

Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 11201

Re: Medina, et al. v. New York State Division of Military
and Naval Affairs, et al.
24-cv-00951 (CM)
Motion to Adjourn Conference

Dear Judge McMahon:

We are counsel for Plaintiffs in the above-referenced case. I write to request adjournment of the initial pretrial conference scheduled for April 25, 2024.

This is a multi-plaintiff, multi-defendant case that seeks to enforce the rights of employees of defendant Rapid Reliable Testing NY, LLC (d/b/a DocGo), a company contracted by the City of New York to provide services to migrants seeking asylum, as well as to enforce the rights of certain migrant clients of DocGo. The complaint in this action was filed on February 8, 2024. Because of the numerous defendants, their geographical disbursement, and the unique circumstances of the plaintiffs, the complaint has not been served. The last date of service is May 8, 2024, and we are making every effort to effectuate service by then.

In addition, we are a small firm; I have a hearing scheduled in State court on Thursday morning that cannot be adjourned. My law partner, Arthur Schwartz, also has a hearing scheduled on Thursday morning. The other attorney in our office who could otherwise attend the conference is having emergency oral surgery and is not available. In consideration of the above, we respectfully request that Court adjourn the Initial Pretrial Conference to a date after May 8, 2024 that is convenient for the Court.

4/23/2024



Hon. Colleen McMahon
April 23, 2024
Page 2

This is Plaintiffs' first request for an adjournment of the Initial Pretrial Conference. As the complaint has not yet been served. Defendants have not yet appeared in this action and thus have expressed no opinion on the adjournment.

Respectfully submitted,

/s/ Laine Alida Armstrong

Laine Alida Armstrong

cc: Counsel of record (via ECF)
Richard Soto (via email)